

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

FRANITZA FAMILY LIMITED PARTNERSHIP,  
MANFRED FRANITZA REVOCABLE TRUST,  
MANFRED FRANITZA, individually and in his  
capacities as General Partner of the Franitza Family  
Limited Partnership and as Trustee and/or  
Beneficiary of the Manfred Franitza Revocable  
Trust, Margrit Franitza, individually and in her  
capacities as General Partner of the Franitza Family  
Limited Partnership and as Trustee and/or  
Beneficiary of the Manfred Franitza Revocable  
Trust, URTE FRANITZA-GOLDSTEIN,  
individually and as General Partner of the Franitza  
Family Limited Partnership, and KAREN  
FENNER, individually and a General Partner of the  
Franitza Family Limited Partnership,

Defendants.

Adv. Pro. No. 10-04476 (SMB)

**STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION**

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including November 24, 2014.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

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Dated: October 22, 2014  
New York, New York

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Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
Bernard L. Madoff*

Dated: October 22, 2014  
New York, New York

By: /s/ Gabrielle J. Pretto  
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Partnership, Manfred Franitza Revocable Trust,  
Manfred Franitza, individually and in his capacities  
as General Partner of the Franitza Family Limited  
Partnership and as Trustee and/or Beneficiary of  
the Manfred Franitza Revocable Trust, Margrit  
Franitza, individually and in her capacities as  
General Partner of the Franitza Family Limited  
Partnership and as Trustee and/or Beneficiary of  
the Manfred Franitza Revocable Trust, Urte  
Franitza-Goldstein, individually and as General*

*Partner of the Frantza Family Limited Partnership,  
and Karen Fenner, individually and a General  
Partner of the Frantza Family Limited Partnership*

Dated: October 22, 2014  
New York, New York

/s/ Deborah A. Reperowitz

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*Mediator*